REMARKS

This paper and the accompanying Request for Continued Examination are responsive to the Office Action dated June 20, 2006 (the "Final Office Action").

Claims 1-30 were previously pending in the application.

Claims 1-28 and 30 have been amended.

No claims have been canceled in this paper.

New claims 35-41 have been added.

Accordingly, claims 1-30 and 35-41 are now pending in the application.

Claims 1-30 stood rejected in the Final Office Action.

Claims 28-30 stood rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,633,846 issued to Bennett et al. ("*Bennett*"). Claims 1-11 and 15-20 stood rejected under 35 U.S.C. § 103(a) as being unpatentable over *Bennett* in view of U.S. Patent No. 5,915,001 issued to Uppaluru ("*Uppaluru*"). Claims 12-14 stood rejected under § 103(a) as being unpatentable over *Bennett* in view of *Uppaluru*, and further in view of U.S. Patent No. 6,724,864 issued to Denenberg et al. ("*Denenberg*"). Claims 21-27 stood rejected under § 103(a) as being unpatentable over *Uppaluru* in view of *Bennett*.

The above amendments add no new matter. Support for the amendments may be found, for example in the Specification as originally filed, for example on p. 19 and in FIG. 4A, among others. While not conceding that the references cited in the Final Office Action qualify as prior art, but instead to expedite prosecution, Applicant has chosen respectfully to traverse the rejection as follows. Applicant reserves the right, for example in a continuing application, to

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establish that the cited references do not qualify as prior art as to an invention embodiment previously, currently, or subsequently claimed. Applicant offers that the claims are allowable and respectfully requests reconsideration in view of the following remarks.

Rejections Under § 103(a)

Claims 1-11 and 15-20 stood rejected under § 103(a) as being unpatentable over *Bennett* in view of *Uppaluru*. Claims 12-14 stood rejected under § 103(a) as being unpatentable over *Bennett* in view of *Uppaluru*, and further in view of *Denenberg*. Claims 21-27 stood rejected under § 103(a) as being unpatentable over *Uppaluru* in view of *Bennett*.

Independent claims 1, 15, and 21 have been amended. Applicant respectfully submits that the amended claims are allowable over the cited references. For example, claim 1 as amended includes limitations of:

> querying a database with a voice identifier,
> in response to the querying, verifying the voice identifier and receiving a password for the enterprise data system from the database.

Applicant respectfully submits that these limitations are not disclosed in the cited references. At least for these reasons, independent claim 1 and all claims dependent therefrom are allowable under § 103(a). At least for similar reasons, independent claims 15 and 21 and all claims dependent therefrom are also allowable under § 103(a).

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Rejections Under § 102(b)

Claims 28-30 stood rejected under § 102(e) as being anticipated by *Bennett*. Applicant respectfully submits that these claims are allowable because the cited material fails to disclose each limitation of the pending claims.

Independent claim 28 is directed to method for accessing an enterprise data system via telephone using a voice access system. The claim includes a limitation of retrieving data corresponding to a query **from a local database**. This limitation is conditional: it is performed **"if pre-compiled data corresponding to the data request is stored in a local database."** The claim also includes a limitation of retrieving data corresponding to the query **from an enterprise data system**. This limitation is also conditional: it is performed **"if pre-compiled data corresponding to the data request is not stored in the local database."** The claim also requires that **local database that is apart from the enterprise data system**.

With regard to the limitation of the local database being apart from the enterprise data system, the Final Office Action on p. 3 argues that this limitation is disclosed in *Bennett*. Applicant respectfully disagrees.

With regard to this limitation, the Final Office Action cites the following passage from *Bennett*.

> Referring to FIG. 11B, in contrast to the first step above, the 2nd step can be considered as the more precise selection portion of the recognition process. It begins with linguistic processing of each of the stored questions in the array returned by the full-text search process as possible candidates representing the user's query. Processing of these stored questions continues in NLE 190 as follows: each question in the array of questions corresponding to the record set returned by the SQL full-text search undergoes morphological linguistic processing at step 1111: in this operation, a text string corresponding to the retrieved candidate question is tokenized, the tags are tagged and the

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tagged tokens are grouped. Next, noun phrases of the string are computed and stored at step 1112. This process continues iteratively at point 1113, and the sequence of steps at 1118, 1111, 1112, 1113 are repeated so that an NP for each retrieved candidate question is computed and stored.

(*Bennett* at 25:19-35.)

The cited passage refers to stored questions in an array. The Final Office Action appears to imply that the *Bennett* array is stored in a local database or an enterprise data system, and that this cited passage thus suggests the use of a local database or an enterprise data system. Even if this characterization of *Bennett* is correct (and Applicant does not concede this point), the cited material does not disclose *both* a local database *and* an enterprise data system. Further, the cited material does not disclose a local database *that is apart from* an enterprise data system. At least this limitation of Applicant's claim 28 is therefore lacking in the cited references.

Further, the Final Office Action proposes on p. 4 that *Bennett* discloses the conditional actions of retrieving data from a local database, and of retrieving data from an enterprise data system. Again, Applicant respectfully disagrees.

With regard to these limitations, the Final Office Action cites the elements 182-184 of FIG. 1 from *Bennett* (which depict a speech recognition engine coupled to a text-to-query converter), and the following passage from *Bennett*.

The 1st step as illustrated in FIG. 11A can be considered a high-speed first-cut pruning mechanism, and includes the following operations: after completing processing of the speech input signal, the user's query is recognized at step 1101, so that the text of the query is simultaneously sent to Natural Language Engine 190 (FIG. 1) at step 1107, and to DB Engine 186 (also FIG. 1) at step 1102. By "recognized" in this context it is meant that the user's query is converted into a text string of distinct native language words through the HMM technique discussed earlier.

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At NLE 190, the text string undergoes morphological linguistic processing at step 1108: the string is tokenized the tags are tagged and the tagged tokens are grouped Next the noun phrases (NP) of the string are stored at 1109, and also copied and transferred for use by DB Engine 186 during a DB Process at step 1110. As illustrated in FIG. 11A, the string corresponding to the user's query which was sent to the DB Engine 186 at 1102, is used together with the NP received from NLE 190 to construct an SQL Query at step 1103. Next, the SQL query is executed at step 1104, and a record set of potential questions corresponding to the user's query are received as a result of a full-text search at 1105, which are then sent back to NLE 190 in the form of an array at step 1106.

(*Bennett* at 24:56—25:12)

The cited passage makes note of a query and a record set of potential questions corresponding to a user's query that are received as a result of a full-text search. However, the cited passage falls short of disclosing the claim limitations for at least two reasons.

First, the cited passage and figure do not at all discuss retrieving data corresponding to a query from a local database or retrieving data corresponding to the query from an enterprise data system, with the local database being *apart from* the enterprise data system.
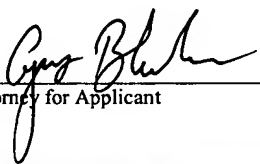
Second, the cited passage and figure do not describe any conditions for retrieving data. In particular, the cited passage and figure do not consider the condition "if pre-compiled data corresponding to the data request is stored in a local database." Additionally, the cited passage and figure do not consider the condition "if pre-compiled data corresponding to the data request is not stored in the local database." These conditions are thus also not disclosed in the cited material.

At least for these reasons, independent claim 28 and all claims dependent therefrom are allowable under § 102(e).
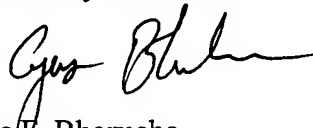
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CONCLUSION

Applicant submits that all claims are now in condition for allowance, and an early notice to that effect is earnestly solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia, 22313-1450, on October 20, 2006.

_____   2006 Oct 20
Attorney for Applicant   Date of Signature

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